

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

**Deutsche Bank National Trust Company as
Trustee for the Certificateholders of IMPAC
Secured Assets Corp., Mortgage Pass-
Through Certificates, Series 2006-4**

Plaintiff

vs.

**Arthur C. McCarthy III and Amelia D.
McCarthy**

Defendants

**Mortgage Electronic Registration Systems,
Inc., as nominee for American Mortgage
Express Corp.**

Party-In-Interest

CIVIL ACTION NO: 2:19-cv-00263-DBH

**MOTION FOR ENTRY OF DEFAULT AS
TO DEFENDANT, AMELIA D.
McCARTHY**

RE:

62 Wildbrook Lane, Eliot, ME 03903

**Mortgage:
August 31, 2006
Book 14944, Page 0679**

NOW COMES the Plaintiff, Deutsche Bank National Trust Company as Trustee for the Certificateholders of IMPAC Secured Assets Corp., Mortgage Pass-Through Certificates, Series 2006-4 (hereinafter “Deutsche Bank”), pursuant to Fed. R. Civ. P. 55(a) and hereby moves for Default, following service, as to Defendant, Amelia D. McCarthy, since said Defendant has not answered nor otherwise appeared in this matter. As grounds therefore, Plaintiff states the following:

1. Plaintiff’s Complaint was filed on June 11, 2020.
2. The Defendant, Amelia D. McCarthy, was served with the subject complaint on December 9, 2019.
3. Proof of Service for Defendant, Amelia D. McCarthy, was filed on March 9, 2020.
4. The Defendant, Amelia D. McCarthy, is not in the military.
5. Plaintiff has brought this action to address five counts entitling it to various forms of relief including Foreclosure; Breach of Note; Breach of Contract, Money Had and Received;

Quantum Meruit; and Unjust Enrichment.

6. By failing to appear in this matter, entry of default in favor of Plaintiff, pursuant to Fed. R.

Civ. P. Rule 55(a) is proper against Defendant, Amelia D. McCarthy.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter default as to Defendant, Amelia D. McCarthy.

DATED: September 21, 2020

/s/Reneau J. Longoria, Esq.
John A. Doonan, Esq., Bar No. 3250
Reneau J. Longoria, Esq., Bar No. 5746
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CERTIFICATE OF SERVICE

I, Reneau J. Longoria, Esq. hereby certify that on this 21st day of September, 2020, I served a copy of the above document by electronic notification using the CM/ECF system and/or First Class Mail to the following:

/s/Reneau J. Longoria, Esq.
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Reneau J. Longoria, Esq., Bar No. 5746
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62 Wildbrook Lane
Eliot, ME 03903

Arthur C. McCarthy III
5 Stevens Court
Exeter, NH 08333.

Amelia D. McCarthy
7 Spinney Creek Road
Eliot, ME 03903

Amelia D. McCarthy
5 Stevens Court
Exeter, NH 08333.

Mortgage Electronic Registration Systems, Inc.
as nominee for American Mortgage Express Corp.
c/o The Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801